

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

UNITED STATES OF AMERICA,	§	
	§	
Plaintiff,	§	
	§	
v.	§	No. 4:24-CR-001-Y
	§	
JOHN ANTHONY CASTRO,	§	
	§	
Defendant.	§	

**UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO FILE SENTENCING MEMORANDUM AND MOTION FOR VARIANCE**

COMES NOW, Defendant John Anthony Castro (“Mr. Castro”), and hereby requests that the Court extend the current deadline of August 28, 2024,<sup>1</sup> to file a sentencing memorandum and furnish material for the Court’s consideration.<sup>2</sup> Mr. Castro also requests an extension to file a motion for variance, currently due by September 4, 2024.<sup>3</sup> Mr. Castro asks the Court to continue these deadlines until September 5, 2024, and would show the following:

**I. This Motion Is Unopposed**

1. Counsel for the United States of America does not oppose the requests to extend the current deadlines to file a defense sentencing memorandum and motion for variance.

**II. Good Cause for Requested Extension**

2. This motion is not filed for the purpose of delay. Only a brief extension is requested.

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<sup>1</sup> Paragraph 11 of Order Granting Unopposed Motion for Extension of Time to File Objections to Presentence Report, Doc. 58 (“Amended Order Setting Schedule for Sentencing”).

<sup>2</sup> Paragraph 12 of Amended Order Setting Schedule for Sentencing.

<sup>3</sup> Paragraph 13 of Amended Order Setting Schedule for Sentencing.

3. Undersigned counsel continues to encounter several logistical challenges in the process of preparing the defense sentencing memorandum and motion for variance. The issues are complex and require extensive research as well as discussions with Mr. Castro.

4. Despite numerous attempts since and during the week of August 19, 2024, through today, undersigned counsel's staff was unable to have FMC Fort Worth personnel or Defendant's counselor arrange an attorney-client teleconference. Undersigned counsel was informed that FMC Fort Worth imposed lockdown procedures during the week of August 19, and that this has been the reason for logistical difficulties. As a result, counsel has been unable to communicate directly with Mr. Castro during this period and needs sufficient opportunity to consult with him regarding these important matters.

WHEREFORE, PREMISES CONSIDERED, Defendant John Castro respectfully requests that the Court extend the current deadlines to file a sentencing memorandum, provide material for the Court's consideration, and to file a motion for variance until September 5, 2024. Defendant requests no further modifications to the Court's Amended Order Setting Schedule for Sentencing.

Dated: August 27, 2024

Respectfully submitted,

By: /s/ Jason B. Freeman  
Jason B. Freeman  
TX Bar No. 24069736  
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**ATTORNEY FOR DEFENDANT**

**CERTIFICATE OF CONFERENCE**

This is to certify that Freeman Law staff conferred with the Assistant United States Attorney Philip J. “P.J.” Meitl on August 27, 2024, regarding whether the government opposes this Motion. Assistant United States Attorney P.J. Meitl indicated that the government does not oppose the motion.

/s/ Jason B. Freeman  
Jason B. Freeman

**CERTIFICATE OF SERVICE**

I hereby certify that on the 27<sup>th</sup> day of August 2024, I filed the foregoing pleading via the Court’s CM/ECF system, which will send electronic notice to all counsel of record.

/s/ Jason B. Freeman  
Jason B. Freeman